

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

JERMAINE DOCKERY, ET AL.

PLAINTIFFS

VS.

CIVIL NO. 3:13-cv-326-WHB-JCG

PELICIA HALL, ET AL.

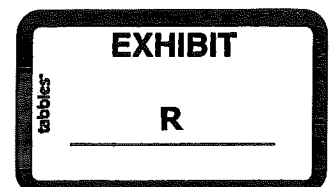
DEFENDANTS

**DEFENDANT'S SECOND SUPPLEMENTAL OBJECTIONS AND
RESPONSES TO PLAINTIFFS' FIFTH SET OF INTERROGATORIES**

* * *

INTERROGATORY NO. 4: Identify all investigations of staff misconduct—including but not limited to any conduct that allegedly violated MDOC, MTC, HALLC, and/or Centurion policies or that violated state or federal law—that have occurred since January 1, 2013. For each investigation, provide the staff member's full name, date of the investigation, the alleged violation, and the result of the investigation.

RESPONSE: Defendant objects to this Interrogatory on grounds that it is overbroad and unduly burdensome in that it does not include a reasonable temporal limitation. Defendant also objects to this Interrogatory as being vague and ambiguous in that the terms "investigations" and "misconduct" are not reasonably defined in any meaningful way. Defendant further objects on grounds that the Interrogatory appears to presuppose all investigations are documented. Subject to and without waiving these or any other objections, please see the attached document being produced with these responses and Bates-stamped DEF-219190 through DEF-219192, which provides the staff member's name, alleged



infraction(s), the discipline issued as a result of the investigation, and the date of the discipline with respect to those staff persons who were investigated for incidents involving (a) the use of force against inmates, (b) contraband intended for inmates, (c) fraternization with inmates, or (d) sexual conduct with inmates during the time period from July 1, 2015, to the present.

SUPPLEMENTAL RESPONSE: Subject to and without waiving the objections raised above or any other objections and consistent with Rule 26(e) of the Federal Rules of Civil Procedure, the correct Bates numbers for the chart referenced above are DEF-238871 through DEF-238873. Please disregard the chart referenced in the original response to Interrogatory Number 4 and Bates-stamped as DEF-219190 through DEF-219192.

SECOND SUPPLEMENTAL RESPONSE: Subject to and without waiving the objections raised above or any other objections and consistent with Rule 26(e) of the Federal Rules of Civil Procedure, please see the attached chart Bates numbered as DEF-300214, which supplements the chart produced at DEF-238871 through DEF-238873.

INTERROGATORY NO. 5: Identify all EMCF staff members who have been informally or formally disciplined since January 1, 2013, including, but not limited to, instances when staff have been sanctioned with suspension, administrative leave, written reprimands, termination, and/or the opportunity to resign.

RESPONSE: Defendant objects to this Interrogatory on grounds that it is overbroad and unduly burdensome in that it does not include a reasonable

substantive or temporal limitation. Defendant further objects to this Interrogatory as being vague and ambiguous in that the phrase “informally or formally disciplined” is not reasonably defined in any meaningful way. Subject to and without waiving these or any other objections, please see the attached document being produced with these responses and Bates-stamped DEF-219190 through DEF-219192, which identifies staff members disciplined for incidents involving (a) the use of force against inmates, (b) contraband intended for inmates, (c) fraternization with inmates, or (d) sexual conduct with inmates during the time period from July 1, 2015, to the present.

SUPPLEMENTAL RESPONSE: Subject to and without waiving the objections raised above or any other objections and consistent with Rule 26(e) of the Federal Rules of Civil Procedure, the correct Bates numbers for the chart referenced above are DEF-238871 through DEF-238873. Please disregard the chart referenced in the original response to Interrogatory Number 5 and Bates-stamped as DEF-219190 through DEF-219192.

SECOND SUPPLEMENTAL RESPONSE: Subject to and without waiving the objections raised above or any other objections and consistent with Rule 26(e) of the Federal Rules of Civil Procedure, please see the attached chart Bates numbered as DEF-300214, which supplements the chart produced at DEF-238871 through DEF-238873.

Dated: July 14, 2017.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Nicholas F. Morisani, do hereby certify that I have this date forwarded, via United States Postal Service, postage prepaid, a true and correct copy of the above and foregoing to the following counsel of record:

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Dated: July 14, 2017.


Nicholas F. Morisani

A		B	C	D	E	F
1	Employee Discipline/Term	July 1, 2015 - May 1, 2017	Responsive to Interrogatories No. 4 & 5 (Fifth Set of Int.)			
2						
3	Name	Alleged Infraction	Discipline	Issue/Term Date	Investigation	Arrested
4	Cameron, Thomas	Failed to report Excessive UOF	NOC: 5 day + 7 day suspension	NA		No
5	Tucker, Necomma	Failed to report Excessive UOF	NOC: 5 day + 7 day suspension	NA		No
6	Lowel, McCarty	Sgt. Fired "warning burst" from a pepperball system at offender while he was secured behind his cell door	NOC: 3 day deferred suspension	NA		No
7	Roberts, Joshua	Captain failed to complete 8 EOR reports and 3 UOF reports	NOC: 3 day suspension	NA	Yes	No
8	Croft, Georgina	Failed to report Excessive UOF	NOC: 5 day + 7 day suspension	NA	Yes	No
9	Graham, Sherika	Failed to report Excessive UOF	NOC: Suspension pending investigation + 10 days suspension	NA		No
10	Dorman, Stephen	Failed to report Excessive UOF	NOC: 5 day + 7 day suspension	NA	Yes	No
11	Stewart, Terry	Officer administered chemical agent to an inmate while he was secured behind his cell door.	NOC: 5 day suspension	NA		No
12	Norris, Alexis	Investigation conducted on 12.30.16 into staff's involvement with inmate. Inmates possession of cell phone contained multiple photos of employee in addition to video chatting while in MTC uniform.	Termination	3/13/2017	Yes	No
13	Duennmel, Amanda	On 1.24.17, employee was asked if they were listed on any inmate visitation list and denied. A background check identified that this employee was listed as an offender's visitor.	Termination	3/20/2017	Yes	No
14	Altman, William	Attempted to solicit the assistance of 3 security staff members for the purpose of introducing cotraband into the facility.	Termination	8/10/2015	Yes	No
15	Purnell, Hentrell	Introduction of Contraband including 1.0 grams of meth, 0.2 grams of meth, 1.0 gram of marijuana & 19 grams of tobacco	Termination	6/29/2016	Yes	Yes
16	Patrick, Otavian	Investigation identifies employee has been receiving money from an offender's brother thru western union	Termination	3/15/2017	Yes	No
17	Ayala, Julian	Excessive UOF on an inmate	Termination	12/15/2015	Yes	No
18	Kazic, Alma	Controlled substance	Termination	8/8/2016	Yes	No
19	Hill, Jeremiah	Tobacco	Termination	8/8/2016	Yes	No
20	Smith, Precious	Contraband	Termination	8/10/2015		No

DEF-238871

A	B	C	D	E	F
21 Spencer, Christopher	Contraband	Termination	2/21/2017 Yes	No	No
22 Thomas, Jr., J.T.	EUOF	Termination	3/6/2016 Yes	No	No
23 Roberts, Joshua	EUOF	Termination	3/15/2016 Yes	No	No
24 Arrington, Terry	EUOF	Termination	3/15/2016 Yes	No	No
25 Felton, Derek	EUOF	Termination	3/8/2016 Yes	No	No
26 Davis, Jacorey	EUOF	Termination	3/8/2016 Yes	No	No
27 McDonald, Jeremy	EUOF	Termination	3/8/2016 Yes	No	No
28 Maurer, Jonathan	EUOF	Termination	3/15/2016 Yes	No	No
29 Everett, Clyde	EUOF	Termination	9/8/2016 Yes	No	No
30 Burton, Weldon	EUOF	Termination	10/10/2016 Yes	No	No
31 Shults, Zachary	EUOF	Termination	4/3/2017 Yes	No	No
32 Vargas, Gennifer	Fraternization	Termination	12/5/2016 Yes	No	No
33 Brown, Beasia	Fraternization	Termination	9/23/2016 Yes	No	No
34 Jones, LaTonya	Fraternization	Termination	3/29/2016 Yes	No	No
35 Ezell, Shakira	Fraternization	Termination	8/10/2015 Yes	No	No
36 Griffin, Natisha	Fraternization	Termination	3/29/2016 Yes	No	No
37 Young, Aldranna	Fraternization	Termination	7/24/2015 Yes	No	No
38 Willis, Qualimazaria	Fraternization	Termination	6/29/2016 Yes	No	No
39 Blanks, Damesha	Fraternization	Termination	6/29/2016 Yes	No	No
40 Johnson, Alexis	Fraternization	Termination	7/18/2016 Yes	No	No
41 Harris, Joanna	Fraternization	Termination	9/8/2016 Yes	No	No
42 Turnage, Alexis	Fraternization	Termination	3/20/2017 Yes	No	No
43 Jenkins, Tyasha	Fraternization	Termination	12/3/2015 Yes	No	No
44 Sturdivant, Quanita	Fraternization	Termination	3/29/2016 Yes	No	No
45 Yarbough, Fannie	Fraternization	Termination	3/15/2016 Yes	No	No
46 Thomas, Patrick	EUOF - failed to report	Termination	1/19/2016 Yes	No	No
47 Grady, Dorelle	EUOF - failed to report	Termination	3/15/2016 Yes	No	No
48 Rodriguez Jr., Orlando	Fraternization	Termination	1/22/2016 Yes	No	No
49 Clay, Jeremy	Contraband	Termination	4/6/2016 Yes	No	No
50 Sims, ShaDana	Fraternization	Termination	12/16/2015 Yes	No	No
51 Sims, Jaivsha	Fraternization	Termination	12/29/2015 Yes	No	No
52 Bonner, Dameyon	EUOF	Termination	12/15/2015 Yes	No	No
53 Barnes, Kimberly	Fraternization	Termination	4/11/2016 Yes	No	No
54 Calhoun, Taiya	Fraternization	Termination	6/6/2016 Yes	No	No
55 Thames, Diamond	Fraternization	Termination	7/18/2016 Yes	No	No
56 Goree, Mahogany	EUOF	Termination	1/17/2017 Yes	No	No
57 Brown, Alexis	Fraternization	Resigned in Lieu	10/26/2016 Yes	No	No
58 Donald, Shaquille	Fraternization	Resigned in Lieu	7/13/2015 Yes	No	No
59 Jones, Marico	Contraband	Resigned in Lieu	8/24/2015 Yes	No	No
60 Mobley, Harold	Fraternization	Resigned in Lieu	10/31/2016 Yes	No	No

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A		B	C	D	E	F
61	Mosley, Denisha	Fraternization	Resigned in Lieu	12/16/2015	Yes	No
62	Fields, Nicasia	Fraternization	Resigned in Lieu	4/4/2017	Yes	No
63	Strickland, Asia	Fraternization	Resigned in Lieu	1/9/2017	Yes	No
64	Lanier, Shureka	Fraternization	Resigned in Lieu	2/24/2017	Yes	No
65	Goss, Nakeisha	Fraternization	Resigned in Lieu	8/27/2015	Yes	No
66	Strong, Andrae	Fraternization	Resigned in Lieu	10/15/2015		No
67	Lewis, Asia	Fraternization	Resigned in Lieu	9/16/2015		No
68	Presswood, Kathera	Fraternization	Resigned in Lieu	4/26/2016	Yes	No

DEF-238873

Employee Discipline/Term May 1,, 2017 - July 13, 2017		Responsive to Interrogatories No. 4 & 5 (Fifth Set of Int.)			
Name	Alleged Infraction	Discipline	Issue/Term Date	Investigation	Arrested
Arnold, Shalynn	Fraternization	Termination	5/1/2017	Yes	No
Granger, Ashley	Fraternization	Termination	5/8/2017	Yes	Yes
Stewart, Terry	Drugscreen	Termination	5/15/2017	No	No
Reed, Keutia	ROC Violation - Abandoned Post	Termination	6/21/2017	No	No
Dean, Jaquasha	ROC Violation	Termination	7/5/2017	No	No
Griffin, Vera	ROC Violation - Abandoned Post	Termination	6/13/2017	No	No
Thompson, Joseph	Drugscreen	Termination	5/17/2017	No	No
Sentura Edwards	EUOF - unauthorized use of chemical	3 Days Suspension - Deferred	N/A	No	No

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